AFTER-ACTION LETTER REPORT
THE FORMER STATLER HILTON HOTEL SITE
1539 WASHINGTON BLVD.
DETROIT, WAYNE COUNTY, MICHIGAN
TDD#: 0308-003

July 2004

Prepared for:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Response Branch

9311 Groh Road
Grosse Ile, Michigan 48138

Prepared by: Lori Ash Date: 7/21/04
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Reviewed and Approved by: C.C. Thom for Ted LaMarre Date: 7/21/04
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SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM
EPA CONTRACT 68-W-00-119

July 21, 2004
12634-001-002-0397-00
DC No. 392-2A-ADZA

Mr. Jeffrey W. Kimble
On-Scene Coordinator
Emergency Response Branch
U.S. Environmental Protection Agency
9311 Groh Road
Grosse Ile, Michigan 48138

Re: After-Action Letter Report
Former Statler Hilton Hotel Site
1539 Washington Blvd.
Detroit, Wayne County, Michigan
TDD: 0308-003

Dear Mr. Kimble:

On September 2, 2003, the United States Environmental Protection Agency (U.S. EPA) tasked the Weston Solutions, Inc. (WESTON®), Superfund Technical Assessment and Response Team (START) contractor to conduct removal oversight activities at the Former Statler Hilton Hotel Site (Site) in Detroit, Wayne County, Michigan.

SITE HISTORY

Site Location and Background

The Site is located at the southwest corner of Grand Circus traffic circle and Washington Boulevard in downtown Detroit, Wayne County, Michigan. The Site address is 1539-1565 Washington Blvd. and is located directly south of the Grand Circus Park **(Attachment A - Figure A-1)**. The Site coordinates are 42° 20' 07" north latitude and 83° 03' 05" west longitude. Commercial buildings surround the former hotel Site to the east, west, and south. The Site includes one main multi-story former hotel building and an attached smoke stack.

The former hotel was constructed in the early 1900s by hotel developer E.M. Statler. The hotel transferred ownership several times over six decades of operation before it closed in 1975. After the hotel ceased operating, an auction was held to sell the contents and items of the building. The hotel building then set idle for 25 years. In 2000, the Michigan Department of Environmental Quality (MDEQ) initiated an asbestos and debris removal inside the former hotel building. Near the end of the asbestos and debris abatement project, MDEQ's contractor discovered the presence of nine transformer carcasses in the basement and one transformer carcass on the fourth floor of the building which potentially contained polychlorinated biphenyl (PCB) oils. In addition, three capacitors were identified in the basement. Subsequent wipe sampling of suspected spill areas in the basement and on the fourth floor of the building revealed the presence of PCB contamination as high as 480,000 micrograms/wipe. The MDEQ determined that PCB oil had migrated into water in the sub-basement of the building. The MDEQ collected and disposed of the water however, the sub-basement subsequently recharged with water.

In August 2002, the MDEQ referred the Statler Hilton Site to the U.S. EPA to assist in securing the facility and performing a time-critical removal action to address the PCB transformers and associated contamination. The referral letter also stated that MDEQ did not know the lateral extent of the PCB contamination and had expended all available funding to address the problems at the Site.

Initial Site Assessment

On October 31, 2002, a Site Assessment (SA) was performed by WESTON under Technical Direction Document (TDD) 0210-007. SA activities conducted by WESTON included documentation of the current Site conditions, determination of the extent of PCB contamination associated with leaking oil from transformers in the structure, and collection and analysis of soil, water, and wipe samples. A more detailed description of the SA activities and results has been documented in a Site Assessment Report prepared by WESTON dated January 2003. This information is also documented in the U.S. EPA Action Memorandum, dated April 24, 2003.

TIME-CRITICAL REMOVAL ACTIVITIES

Contractors

Time-critical removal activities were conducted at the site by the U.S. EPA from September 2, 2003 through December 12, 2003. Environmental Quality Management (EQM) was the Emergency and Rapid Response Services (ERRS) Contractor assigned to conduct the time-critical removal activities at the Site. EQM and their subcontractors performed all work related to the removal of the transformers and all PCB contaminated material. Ms. Lori Ash of WESTON was on-site to provide removal oversight and documentation support from September 2, 2003 through November 21, 2003. WESTON activities included written and photographic documentation of removal activities, collection of cleanup confirmation samples, and providing technical assistance to the U.S. EPA On-Scene Coordinator (OSC).

Removal Activities - September 2003

During the week of September 2, 2003, the U.S. EPA mobilized contractors and equipment to the Site in preparation for removal activities. The command post, hot zone, contamination reduction zone(CRZ), and personnel decontamination areas were established. A site-specific Emergency Contingency Plan was developed and distributed to local authorities. All work within the designated hot zone was conducted in

modified Level D or Level C personal protective equipment (PPE), in accordance with the site-specific health and safety plan (HASP).

PCB removal activities commenced on September 4, 2003. ERRS personnel removed debris from the basement to an on-site roll-off box for future disposal. Background and personnel air samples were collected and submitted to an independent off-site laboratory, AAC Trinity Laboratory (AA Trinity), for PCB analysis via National Institute for Occupational Safety and Health (NIOSH) Method 5503. On the fourth floor, three visible oil stained areas were cleaned with the following decontamination solutions to field test a variety of cleanup solutions to determine an appropriate remediation plan: mineral spirits, Less than Ten, and Simple Green. Prior to cleaning, one wipe sample was collected from each of the three areas (FSHH-WP-001 thru FSHH-WP-003). Six wipe samples (FSHH-WP-004 thru FSHH-WP-009) were collected from the fourth floor areas after cleaning and submitted for PCB analysis via EPA Method 8082 to determine the effectiveness of the various decontamination solutions.

Analytical results all samples collected during the removal activities are summarized in **Attachment B**. Air sample results are summarized in **Table B-1**. Water, oil, and wipe sample results are summarized in **Table B-2.** Solid sample results are summarized in **Table B-3.**

During the week of September 8, 2003, ERRS personnel removed the transformers and capacitors from the basement and staged them within the ground level hot zone for future off-site disposal. Plastic sheeting was wrapped and taped around the transformers. Oil collected from the transformers and capacitors was contained in 55-gallon drums and staged for disposal. ERRS personnel also began power sweeping in the basement and random solid/debris samples (FSHH-SOLID-001 thru FSHH-SOLID-007) were collected to determine the extent of the PCB contamination. Debris in the elevator shaft was scraped and removed and fourth floor scarifying was initiated. In addition, suspected asbestos containing material (ACM) was encountered in one of the work areas in the basement. ERRS personnel bagged the ACM for future disposal to ensure safety for the workers in this area.

During the week of September 15, 2003, 22,500 kilograms of PCB contaminated transformer carcasses and capacitors were transported off-site for disposal. ERRS personnel initiated the physical scraping and removal of loose debris from large machinery and building structures and also initiated scarifying of the floor in the basement. A total of 15,150 kilograms of PCB-contaminated solid debris was transported off-site for disposal. The fourth floor scarifying was completed by ERRS and concrete core samples (FSHH-CC-001 through FSHH-CC-003) were collected for cleanup confirmation. The cores were pulverized and submitted to AA Trinity for PCB analysis. A waste profile sample was also collected and submitted to US Liquids to characterize the water in the sub-basement.

During the week of September 22, 2003 , ERRS personnel initiated the removal of the PCB-contaminated water from the sub-basement. Approximately 321,320 gallons of sub-basement water was shipped off-site for disposal. ERRS personnel also continued debris removal from the basement and transported 5,089 kilograms of PCB-contaminated material off-site for disposal. One concrete core sample was collected (FSHH-CC-004) from the basement to assess the progress of the floor decontamination activities. Sample results from the fourth floor decontamination effort were received and the results confirmed that the remediation effort was successful (FSHH-CC-001 thru FSHH-CC-003). Therefore, the fourth floor decontamination was complete.

During the week of September 29, 2003, ERRS personnel continued with the removal of water in the sub-basement and began decontaminating the sub-basement via high pressure washing with a decontamination

solution. Concrete core samples (FSHH-CC-005 thru FSHH-CC-007) were collected from a small room located in the sub-basement after pressure washing was complete. Sample locations for the sub-basement floor are shown on **Figure A-3 (Attachment A)**. ERRS personnel commenced removal of concrete in the basement.

Removal Activities - October 2003

During the week of October 6, 2003, ERRS personnel continued with the removal of water and pressure washing in the sub-basement. A weekly total of 21,590 gallons of water was removed from the sub-basement and transported off-site for disposal. Concrete core sampling was conducted in the sub-basement where pressure washing was performed to verify whether cleanup goals had been met. Concrete cores (FSHH-CC-009 thru FSHH-CC-029) were submitted to an independent off-site laboratory for PCB analysis.

During the week of October 13, 2003, ERRS personnel completed the removal of water and concrete core sampling (FSHH-CC-030 thru FSHH-CC-100) in the sub-basement. ERRS personnel removed a capacitor closet from the basement and placed it into an on-site roll-off box. Demolition and removal of the concrete in the basement where the transformers were located continued. The concrete in the back room where the dielectric fluid from the transformers spilled was also demolished and placed into roll-off boxes. A weekly total of 14,225 gallons of PCB-contaminated water was removed from the sub-basement and transported off-site for disposal.

During the week of October 20, 2003, ERRS personnel began scraping and removing all loose debris from machinery and the elevator shaft in the basement. The top layer of debris in the main elevator shaft contained elevated PCB levels. ERRS personnel removed the top layer of debris and resampled the debris (FSHH-SOLID-008 thru FSHH-SOLID-009). Samples were submitted to AA Trinity for PCB analysis. The analytical results for the two additional samples indicated PCB concentrations below 50 parts per million (ppm) and the OSC determined that due to the unstable nature of material in the elevator shaft, no additional debris would be removed. The decision was based in part on the safety of the workers. Suspect ACM samples (FSHH-OT-001 thru FSHH-OT-004) were also collected and submitted to AA Trinity.

During the week of October 27, 2003, ERRS personnel initiated pressure washing in the basement where the transformers had been located. Decontamination water was drummed and staged for future disposal. WESTON personnel began concrete core sampling in the basement (FSHH-CC-101 thru FSHH-CC-158) to confirm that cleanup goals had been met. Samples were submitted to AA Trinity for PCB analysis. Sample locations for the basement floor are shown on **Figure A-2 (Attachment A)**.

Removal Activities - November 2003

During the week of November 3, 2003, ERRS personnel continued pressure washing of the basement floor. Decontamination water was staged in trenches located in the basement. One sample (FSHH-AQ-002) was collected from the decontamination water and submitted to AA Trinity for PCB analysis. WESTON continued collecting concrete core samples in the basement (FSHH-CC-159 thru FSHH-CC-176) for cleanup verification.

In addition, START personnel received analytical results from previously submitted concrete core samples collected in the transformer area of the basement. Analytical results indicated that PCB concentrations remained above the cleanup goal of 50 ppm. ERRS personnel began to further demolish and dispose of concrete in this area.

During the week of November 10, 2003, ERRS personnel continued demolishing the concrete in the basement area. Approximately 11,100 gallons of decontamination water was removed and transported off-site for disposal. A total of 20,846 kilograms of PCB-contaminated material was transported and off-site for disposal. WESTON personnel continued collection cleanup verification core samples (FSHH-CC-177 thru FSHH-CC-468). Samples were submitted top AA Trinity for PCB analysis. ERRS personnel removed all remaining debris and placed it into on-site roll-off boxes for disposal, and commenced pressure washing in all areas.

No work was performed at the Site from November 19 to December 07, 2003.

Removal Activities - December 2003

During the week of December 8, 2003, U.S. EPA and ERRS personnel mobilized back to the Site to complete remediation of the areas that still had PCB concentrations above 50 ppm. The four areas where PCB concentrations in the concrete floor were between 50-100 ppm were sealed with two part epoxy (two coats - two colors). PCB-contaminated soils encountered beneath the demolished concrete floor in the main transformer area were removed to a depth of 18"-36" and placed into an on-site roll-off box. Cleanup verification soil samples were collected and the analytical results showed that the PCB concentrations in soil in one 9' X 9' grid area (main transformer area) were still above 50 ppm (sample locations 134, 135 and 123 on **Figure A-2**). A plastic liner was placed over the soil and concrete was subsequently poured in this area to prevent future exposure to the PCB soils. .

In addition, the small area adjacent to the CRZ was chemically treated and washed. The area was resampled and analytical results indicated that PCB concentrations were less than 1 ppm. A total of 1,265 gallons of PCB-contaminated water and 9,500 kilograms of PCB-contaminated solids were removed and transported off-site for disposal.

On December 15, 2003, ERRS personnel disposed of empty high pressure air cylinders that had been discovered in the basement. This completed all removal and demobilization activities at the Site.

Summary

Waste materials generated during the removal and disposed of off-site included the following:

- 404,412 gallons of PCB-contaminated liquid;
- 145,746 kilograms of PCB-contaminated solids;
- 22,500 kilograms of transformer/capacitor carcasses; and
- 23 55-gallon sealed drums of a oil/water mixture.

A waste disposal summary table detailing all waste removed from the Site during the removal is included as **Attachment C**. Select photo documentation of the removal is provided in **Attachment D**. Complete photo documentation is available in the Site file.

This letter report completes the reporting requirements under this TDD. Please do not hesitate to call if any clarification of further assistance is needed.

Very truly yours,

WESTON SOLUTIONS OF MICHIGAN, INC.

Lori Ash
START Site Lead

for Ted LaMarre

Ted LaMarre
START Project Manager

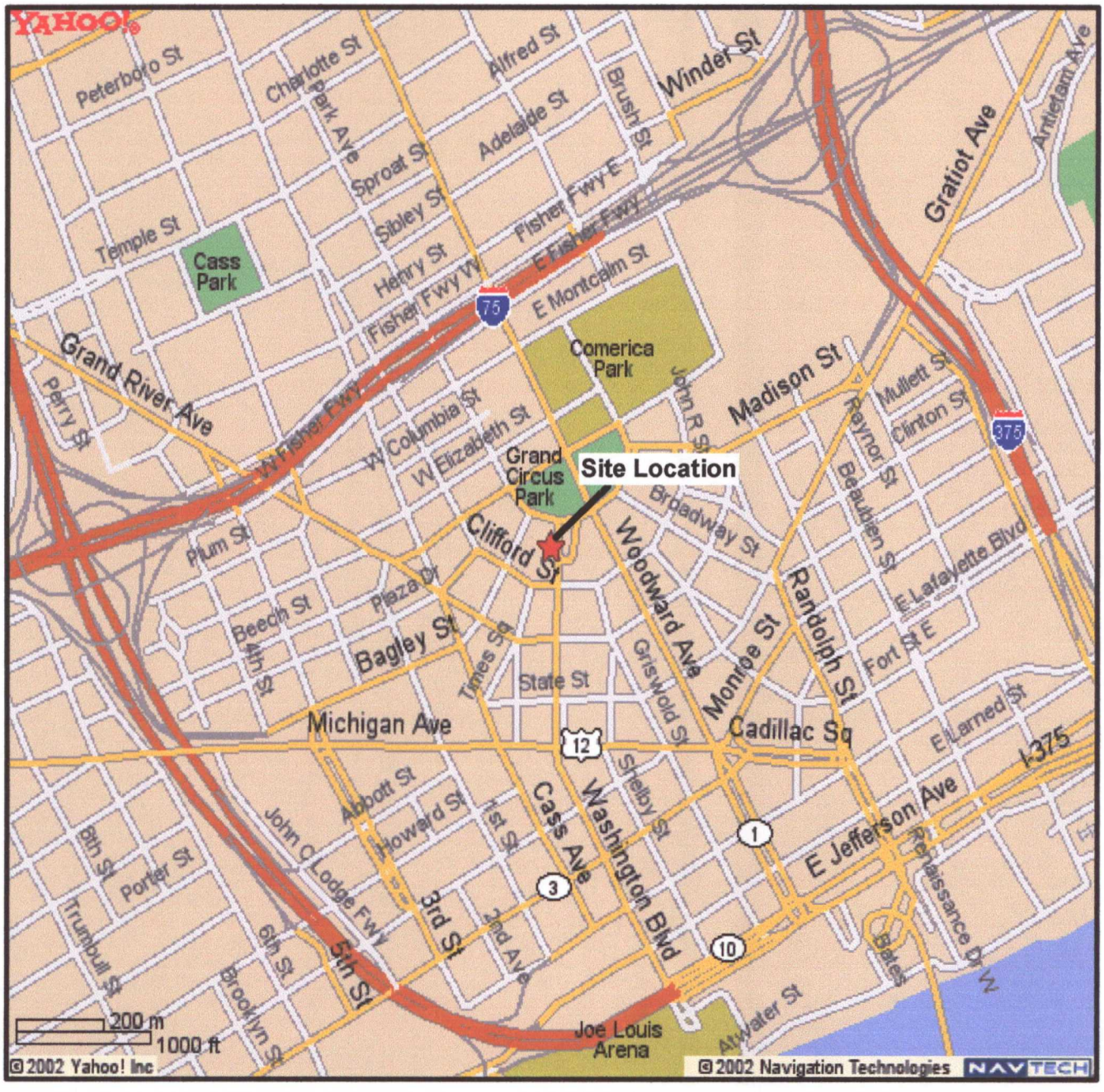
Attachments:
- A Site Figures
  - A-1 Site Location
  - A-2 Basement Sample Locations
  - A-3 Sub-Basement Sample Locations
- B Analytical Results Table
  - B-1 Summary of Analytical Results - Air Samples
  - B-2 Summary of Analytical Results- Water, Oil, and Wipe Samples
  - B-3 Summary of Analytical Results - Solid Samples
- C Waste Disposal Table
  - C-1 Waste Disposal Table
- D Select Photo Documentation

cc: Ms. Gail Nabasny, START Project Officer
File

Attachment A

Site Figures

Figure A-1	**Site Location Map**
Figure A-2	**Basement Sample Locations**
Figure A-3	**Sub-Basement Sample Locations**



Site Location Map Former Statler Hilton Hotel Site 1539 Washington Blvd. Detroit, Wayne County, Michigan	Figure A-1 Date: 03/25/04
Drawn By: L. Ash	WESTON SOLUTIONS Restoring Resource Efficiency

N

Basement Sample Locations Former Statler Hilton Hotel Site 1539 Washington Blvd Detroit, Wayne County, Michigan	Figure A-2
	Date: 03/10/04
Drawn By: L. Ash	WESTON SOLUTIONS Restoring Resource Efficiency

Note: Not to scale

LEGEND

- = 0-1 ppm
- = 2-10 ppm
- = 11-19 ppm
- = 20-49 ppm
- = 50 ppm and above
- Sealed with Epoxy

N

FSHH-SOLID-007

FSHH-SOLID-005

FSHH-SOLID-006

SHAFT

STAIRS

STAIRS

SHAFT

STAIRS

Sealed with concrete

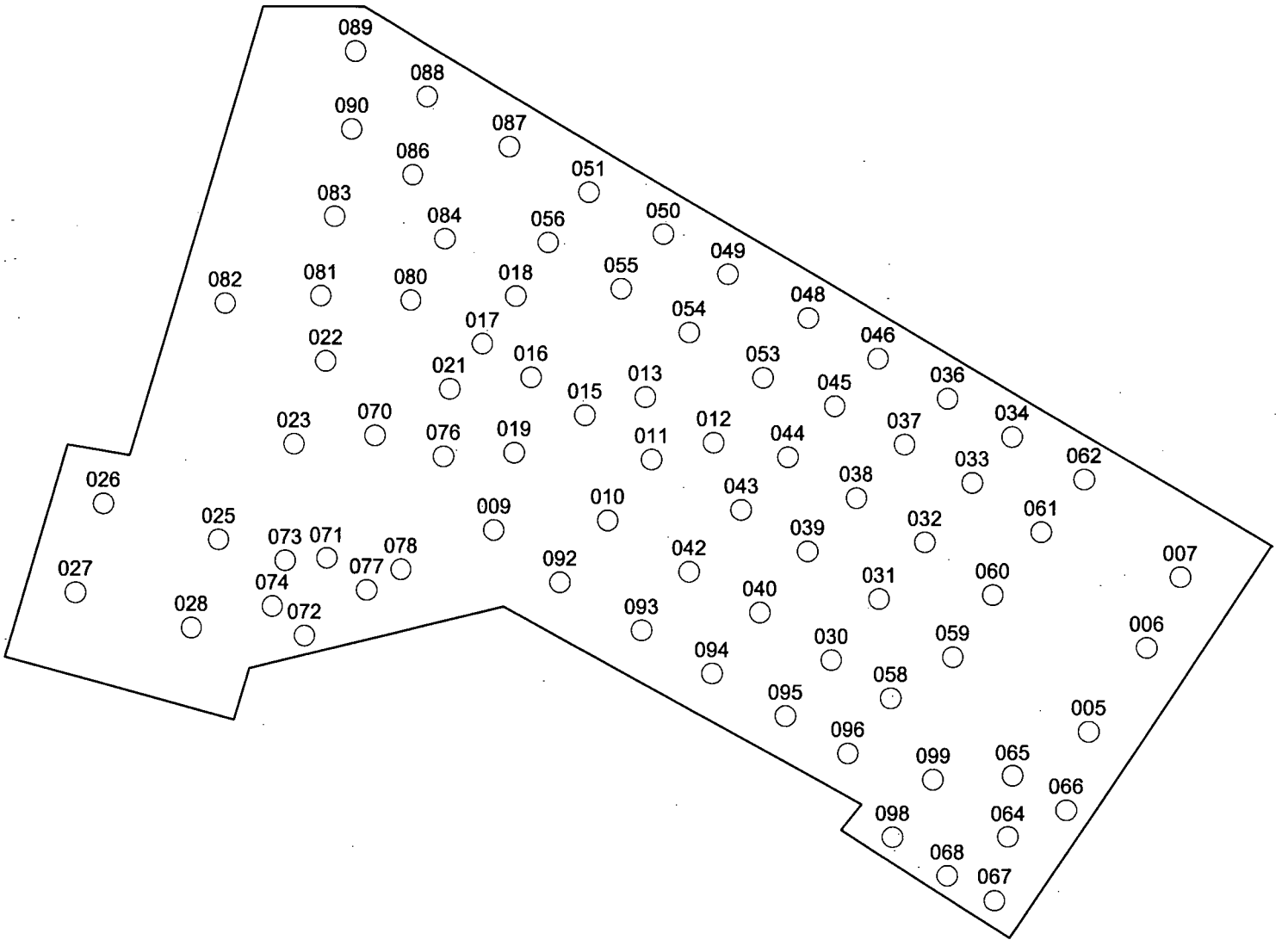
Sealed with concrete

N

○ = 0-1 ppm

Sub-Basement Sample Locations Former Statler Hilton Hotel Site 1539 Washington Blvd. Detroit, Wayne County, Michigan	Figure A-3
	Date: 03/10/04
Drawn By: L. Ash	WESTON SOLUTIONS Restoring Resource Efficiency

Note: Not to scale



Attachment B

Analytical Results Table

Table B-1
Summary of Analytical Results-Air Samples
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

SAMPLE ID	SAMPLE DATE	SAMPLE TIME	MATRIX	LOCATION	DESCRIPTION	PCB RESULT	UNIT
FSHH-AIR-003	9/7/2003	737	Air	Personal	ERRS personnel	2.8	Total ug
FSHH-AIR-001	9/7/2003	900	Air	Site Area	Washington Blvd. Entrance	<0.1	Total ug
FSHH-AIR-002	9/7/2003	900	Air	Site Area	Bagley Street Entrance	<0.1	Total ug
FSHH-AIR-004	9/7/2003	915	Air	Personal	ERRS personnel	0.73	Total ug
FSHH-AIR-005	9/7/2003	1700	Air	Blank	Blank for calibration	<0.1	Total ug

NOTE:

Total ug = Total micrograms

ERRS = Emergency and Rapid Response Services

Table B-2
Summary of Analytical Results- Water, Oil, and Wipe Samples
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

SAMPLE ID	SAMPLE DATE	SAMPLE TIME	MATRIX	LOCATION	DESCRIPTION	PCB RESULT	UNIT
SH-01	8/21/2003	1115	Water	Sub-basement	Sub-basement water	0.00038	ppm
FSHH-AQ-001	9/3/2003	930	Water	Sub-basement	Sub-basement water	NA*	NA
FSHH-WP-001	9/6/2003	1330	Wipe	4th Floor	Area 1 (Less than Ten) Pre-clean	200	Total ug
FSHH-WP-002	9/6/2003	1345	Wipe	4th Floor	Area 2 (Mineral Spirits) Pre-clean	110	Total ug
FSHH-WP-003	9/6/2003	1350	Wipe	4th Floor	Area 3 (Simple Green) Pre-clean	72	Total ug
FSHH-WP-004	9/6/2003	1356	Wipe	4th Floor	Area 1 (Less than Ten) one application	18	Total ug
FSHH-WP-005	9/6/2003	1401	Wipe	4th Floor	Area 1 (Less than Ten) two applications	<5.0	Total ug
FSHH-WP-006	9/6/2003	1403	Wipe	4th Floor	Area 2 (Mineral Spirits) one application	30	Total ug
FSHH-WP-007	9/6/2003	1411	Wipe	4th Floor	Area 2 (Mineral Spirits) two applications	15	Total ug
FSHH-WP-008	9/6/2003	1415	Wipe	4th Floor	Area 3 (Simple Green) one application	9.6	Total ug
FSHH-WP-009	9/6/2003	1420	Wipe	4th Floor	Area 3 (Simple Green) two applications	<5.0	Total ug
FSHH-OIL-001	9/22/2003	1410	Oil/Water	Basement	Oil/water mix from 55 gallon drum	3.3	ppm
FSHH-AQ-002	11/4/2003	1349	Water	Basement	Wash water in trench from basement	1.3	ppm
FSHH-AQ-003	11/11/2003	1115	Water	Basement	Water filled elevator shaft	0.004	ppm

NOTE:
ppm= Parts per million
Total ug = Total micrograms
NA = Not applicable

Table B-3
Summary of Analytical Results-Solid Samples
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

SAMPLE ID	SAMPLE DATE	SAMPLE TIME	MATRIX	LOCATION	DESCRIPTION	PCB RESULT	UNIT
FSHH-SOLID-001	9/10/2003	1535	Solid	Basement	Debris pile NW corner	390	ppm
FSHH-SOLID-002	9/10/2003	1540	Solid	Basement	Debris pile N side	21000	ppm
FSHH-SOLID-003	9/10/2003	1543	Solid	Basement	East side elevator shaft	18	ppm
FSHH-SOLID-004	9/10/2003	1545	Solid	Basement	West side of elevator shaft	110	ppm
FSHH-SOLID-005	9/10/2003	1550	Solid	Basement	Debris on floor SW corner	2.1	ppm
FSHH-SOLID-006	9/10/2003	1555	Solid	Basement	Debris from Bakery floor	2.6	ppm
FSHH-SOLID-007	9/10/2003	1600	Solid	Basement	Debris from Locker room floor	0.75	ppm
FSHH-CC-001	9/17/2003	1300	Concrete	4th Floor	4th floor spill area	1.9	ppm
FSHH-CC-002	9/17/2003	1321	Concrete	4th Floor	4th floor spill area	0.52	ppm
FSHH-CC-003	9/17/2003	1337	Concrete	4th Floor	4th floor spill area	0.33	ppm
DUP-001	9/18/2003	1338	Concrete	Sub-basement	FSHH-CC-003	0.23	ppm
FSHH-CC-004	9/24/2003	1749	Concrete	Basement	Main transformer area	1600	ppm
FSHH-CC-008	10/3/2003	730	Concrete	Sub-basement	Composite of 005,006,& 007	0.165	ppm
FSHH-CC-014	10/10/2003	1108	Concrete	Sub-basement	Composite of 009, 010, 011, 012, & 013	<.165	ppm
FSHH-CC-020	10/10/2003	1128	Concrete	Sub-basement	Composite of 015, 016, 017, 018, & 019	<.165	ppm
FSHH-CC-024	10/11/2003	950	Concrete	Sub-basement	Composite of 021, 022, & 023	<0.99	ppm
FSHH-CC-029	10/11/2003	1010	Concrete	Sub-basement	Composite of 025, 026, 027, & 028	0.132	ppm
FSHH-CC-035	10/14/2003	1317	Concrete	Sub-basement	Composite of 030, 031,032, 033, & 034.	<.165	ppm
FSHH-CC-041	10/14/2003	1333	Concrete	Sub-basement	Composite of 036, 037, 038, 039 & 040.	<.165	ppm
FSHH-CC-047	10/14/2003	1350	Concrete	Sub-basement	Composite of 042, 043, 044, 045, & 046.	<.165	ppm
FSHH-CC-052	10/14/2003	1412	Concrete	Sub-basement	Composite of 048, 049, 050, & 051.	0.080	ppm
FSHH-CC-057	10/14/2003	1425	Concrete	Sub-basement	Composite of 053, 054, 055, & 056.	0.132	ppm
FSHH-CC-063	10/16/2003	1450	Concrete	Sub-basement	Composite of 058, 059, 060, 061, & 062.	0.035	ppm
FSHH-CC-069	10/16/2003	1510	Concrete	Sub-basement	Composite of 064, 065, 066, 067, & 068.	0.17	ppm
DUP-002	10/16/2003	1555	Concrete	Sub-basement	FSHH-CC-075	<.165	ppm
FSHH-CC-075	10/16/2003	1555	Concrete	Sub-basement	Composite of 070, 071, 072, 073, & 074.	<.165	ppm
FSHH-CC-079	10/16/2003	1600	Concrete	Sub-basement	Composite of 076, 077, & 078.	0.024	ppm
FSHH-CC-085	10/16/2003	1610	Concrete	Sub-basement	Composite of 080, 081, 082, 083 & 084.	0.150	ppm
FSHH-CC-091	10/16/2003	1620	Concrete	Sub-basement	Composite of 086, 087, 088, 089, & 090.	0.255	ppm
FSHH-CC-097	10/16/2003	1630	Concrete	Sub-basement	Composite of 092, 093, 094, 095, & 096.	0.295	ppm
FSHH-CC-100	10/16/2003	1633	Concrete	Sub-basement	Composite of 098 & 099	0.04	ppm
FSHH-OT-001	10/22/2003	1009	Solid	Basement	Suspect ACM material	35%	Total*
FSHH-OT-002	10/22/2003	1010	Solid	Basement	Suspect ACM material	0%	Total*
FSHH-OT-003	10/22/2003	1011	Solid	Basement	Suspect ACM material	50%	Total*
FSHH-OT-004	10/22/2003	1012	Solid	Basement	Suspect ACM material	20%	Total*
FSHH-SOLID-008	10/22/2003	1020	Solid	Basement	Resample elevator shaft FSHH-SOLID-004	17	ppm
FSHH-SOLID-009	10/23/2003	1040	Solid	Basement	Resample elevator shaft FSHH-SOLID-003	42	ppm
FSHH-CC-116	10/28/2003	1130	Concrete	Basement	Main transformer area	47	ppm
FSHH-CC-117	10/28/2003	1137	Concrete	Basement	Main transformer area	36	ppm
FSHH-CC-118	10/28/2003	1144	Concrete	Basement	Main transformer area	4.1	ppm
FSHH-CC-119	10/28/2003	1150	Concrete	Basement	Main transformer area	21	ppm
FSHH-CC-125	10/28/2003	1153	Concrete	Basement	Main transformer area	2	ppm
FSHH-CC-124	10/28/2003	1155	Concrete	Basement	Main transformer area	1300	ppm
FSHH-CC-126	10/28/2003	1330	Concrete	Basement	Main transformer area	4.1	ppm
FSHH-CC-131	10/28/2003	1330	Concrete	Basement	Main transformer area	6.1	ppm
FSHH-CC-127	10/28/2003	1336	Concrete	Basement	Main transformer area	13	ppm
FSHH-CC-128	10/28/2003	1341	Concrete	Basement	Main transformer area	0.3	ppm
FSHH-CC-129	10/28/2003	1346	Concrete	Basement	Main transformer area	24	ppm
FSHH-CC-132	10/28/2003	1349	Concrete	Basement	Main transformer area	58	ppm
FSHH-CC-133	10/28/2003	1359	Concrete	Basement	Main transformer area	290	ppm
FSHH-CC-134	10/28/2003	1403	Concrete	Basement	Main transformer area	51	ppm

Table B-3
Summary of Analytical Results-Solid Samples
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

SAMPLE ID	SAMPLE DATE	SAMPLE TIME	MATRIX	LOCATION	DESCRIPTION	PCB RESULT	UNIT
FSHH-CC-135	10/28/2003	1415	Concrete	Basement	Main transformer area	16	ppm
FSHH-CC-141	10/28/2003	1421	Concrete	Basement	Main transformer area	10	ppm
FSHH-CC-142	10/28/2003	1427	Concrete	Basement	Main transformer area	5.8	ppm
FSHH-CC-143	10/28/2003	1440	Concrete	Basement	Main transformer area	0.48	ppm
FSHH-CC-144	10/28/2003	1555	Concrete	Basement	Main transformer area	0.19	ppm
FSHH-CCC-001	10/29/2003	1003	Concrete	Basement	Composite of samples 101, 102, 103, 104, & 105	2.7	ppm
FSHH-CCC-002	10/29/2003	1015	Concrete	Basement	Composite of samples 106, 107, 108, 109, & 110	3.8	ppm
FSHH-CCC-003	10/29/2003	1018	Concrete	Basement	Composite of samples 111, 112, 113, 114, & 115	2.6	ppm
FSHH-CCC-004	10/29/2003	1123	Concrete	Basement	Composite of samples 120, 121, 122, & 123	76	ppm
FSHH-CCC-006	10/29/2003	1148	Concrete	Basement	Composite of samples 130, 136, 137, 138, & 139	3.4	ppm
FSHH-CCC-007	10/29/2003	1300	Concrete	Basement	Composite of samples 140, 149, & 150.	6.9	ppm
FSHH-CCC-005	10/29/2003	1310	Concrete	Basement	Composite of samples 145, 146, 147, & 148	1.4	ppm
FSHH-CCC-008	10/29/2003	1318	Concrete	Basement	Composite of samples 151, 152, & 153.	12	ppm
FSHH-CCC-009	10/29/2003	1325	Concrete	Basement	Composite of samples 154, 155, 156, 157, & 158	3.8	ppm
DUP-003	10/29/2003	1345	Concrete	Basement	Duplicate of FSHH-CCC-009	65	ppm
DUP-004	10/29/2003	1346	Concrete	Basement	Duplicate of FSHH-CCC-006	45	ppm
DUP-005	10/29/2003	1417	Concrete	Basement	Duplicate of FSHH-CC-144	0.36	ppm
FSHH-SOLID-010	11/7/2003	1240	Solid	Basement	Small room full of debris, behind shaft on east side	0.87	ppm
FSHH-CC-159	11/8/2003	820	Concrete	Basement	Back transformer room where one transformer spilled	73	ppm
FSHH-CC-160	11/8/2003	828	Concrete	Basement	Back transformer room where one transformer spilled	32	ppm
FSHH-CC-161	11/8/2003	835	Concrete	Basement	Back transformer room where one transformer spilled	47	ppm
FSHH-CC-162	11/8/2003	842	Concrete	Basement	Back transformer room where one transformer spilled	160	ppm
FSHH-CC-175	11/8/2003	1103	Concrete	Basement	Transformer room	1.8	ppm
FSHH-CC-176	11/8/2003	1110	Concrete	Basement	Transformer room	1.8	ppm
FSHH-CCC-010	11/8/2003	1135	Concrete	Basement	Composite of samples 163, 164, 165, & 166	184	ppm
FSHH-CCC-011	11/8/2003	1145	Concrete	Basement	Composite of samples 167, 168, 169, & 170	2.12	ppm
FSHH-CCC-012	11/8/2003	1145	Concrete	Basement	Composite of sample 171, 172, 173, & 174	2.4	ppm
FSHH-CCC-013	11/10/2003	1400	Concrete	Basement	Composite of sample 177, 178, 179, 180, & 181	0.1	ppm
FSHH-CCC-014	11/10/2003	1430	Concrete	Basement	Composite of 182, 183, 184, 185, & 186	0.025	ppm
FSHH-CCC-015	11/10/2003	1445	Concrete	Basement	Composite of 187, 188, 189, 190, & 191	0.55	ppm
FSHH-CC-198	11/12/2003	1105	Concrete	Basement	NW transformer room	0.2	ppm
FSHH-CCC-016	11/13/2003	1035	Concrete	Basement	Composite of samples 195, 196, & 197	9.3	ppm
FSHH-CCC-017	11/13/2003	1045	Concrete	Basement	Composite of samples 192, 193, & 194	5.1	ppm
FSHH-CCC-018	11/13/2003	1055	Concrete	Basement	Composite of samples 199, 200, 202, & 203	2.12	ppm
FSHH-CCC-019	11/13/2003	1105	Concrete	Basement	Composite of samples 204, 209, 212, 213, & 214	9.5	ppm
FSHH-CCC-020	11/13/2003	1115	Concrete	Basement	Composite of samples 201, 205, 206, 207, & 208	1.2	ppm
FSHH-CCC-021	11/13/2003	1240	Concrete	Basement	Composite of samples 215, 216, 217, & 218	3.48	ppm
FSHH-CCC-022	11/13/2003	1245	Concrete	Basement	Composite of samples 219, 220, 221, & 231	1.6	ppm
FSHH-CCC-023	11/13/2003	1250	Concrete	Basement	Composite of samples 222, 223, 224, & 232	0.6	ppm
FSHH-CCC-024	11/13/2003	1255	Concrete	Basement	Composite of samples 210, 211, 229, 230, & 233	2.55	ppm
FSHH-CCC-025	11/13/2003	1305	Concrete	Basement	Composite of samples 225, 226, 227, & 237	19.2	ppm
FSHH-CCC-026	11/13/2003	1309	Concrete	Basement	Composite of samples 228, 234, 235, 236, & 238.	0.6	ppm
FSHH-CC-120-2	11/14/2003	1045	Concrete	Basement	Re-sample hot zone main transformer area	3.8	ppm
FSHH-CC-121-2	11/14/2003	1050	Concrete	Basement	Re-sample hot zone main transformer area	0.62	ppm

Table B-3
Summary of Analytical Results-Solid Samples
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

SAMPLE ID	SAMPLE DATE	SAMPLE TIME	MATRIX	LOCATION	DESCRIPTION	PCB RESULT	UNIT
FSHH-CC-122-2	11/14/2003	1055	Concrete	Basement	Re-sample hot zone main transformer area	25	ppm
FSHH-CC-123-2	11/14/2003	1100	Concrete	Basement	Re-sample hot zone main transformer area	100	ppm
FSHH-CC-132-2	11/14/2003	1100	Concrete	Basement	Re-sample hot zone main transformer area	370	ppm
FSHH-CC-133-2	11/14/2003	1105	Concrete	Basement	Re-sample hot zone main transformer area	800	ppm
FSHH-CC-134-2	11/14/2003	1110	Concrete	Basement	Re-sample hot zone main transformer area	730	ppm
FSHH-CC-154-2	11/14/2003	1135	Concrete	Basement	Re-sample hot zone main transformer area	0.97	ppm
FSHH-CC-155-2	11/14/2003	1140	Concrete	Basement	Re-sample hot zone main transformer area	51	ppm
FSHH-CC-124-2	11/14/2003	1145	Concrete	Basement	Re-sample hot zone main transformer area	4.2	ppm
FSHH-CC-156-2	11/14/2003	1145	Concrete	Basement	Re-sample hot zone main transformer area	1.1	ppm
FSHH-CC-157-2	11/14/2003	1150	Concrete	Basement	Re-sample hot zone main transformer area	2.4	ppm
FSHH-CC-158-2	11/14/2003	1155	Concrete	Basement	Re-sample hot zone main transformer area	0.5	ppm
FSHH-CCC-027	11/17/2003	730	Concrete	Basement	Composite of samples 239, 240, 250, 251, & 252.	65	ppm
FSHH-CCC-028	11/17/2003	735	Concrete	Basement	Composite of samples 241, 242, 243, 244, & 245.	0.7	ppm
FSHH-CCC-029	11/17/2003	740	Concrete	Basement	Composite of samples 246, 247, 248, & 249.	16	ppm
FSHH-CCC-030	11/17/2003	745	Concrete	Basement	Composite of samples 253, 254, 255, 257, & 258.	0.26	ppm
FSHH-CCC-031	11/17/2003	750	Concrete	Basement	Composite of samples 259, 260, 261, & 262.	21.6	ppm
FSHH-CCC-032	11/17/2003	755	Concrete	Basement	Composite of samples 256, 295, & 296.	0.72	ppm
FSHH-CCC-033	11/17/2003	800	Concrete	Basement	Composite of samples 263, 264, 265, 266, & 267.	37	ppm
FSHH-CCC-034	11/17/2003	805	Concrete	Basement	Composite of samples 268, 269, 270, 271, & 272.	6	ppm
FSHH-CCC-035	11/17/2003	810	Concrete	Basement	Composite of samples 273, 279, 280, 281, & 282.	1.1	ppm
FSHH-CCC-036	11/17/2003	815	Concrete	Basement	Composite of samples 274, 275, 276, 277, & 278.	85	ppm
FSHH-CCC-037	11/17/2003	820	Concrete	Basement	Composite of samples 283, 284, 285, 286, & 287.	5.5	ppm
FSHH-CCC-038	11/17/2003	825	Concrete	Basement	Composite of samples 288, 289, 290, 291, & 292.	0.95	ppm
FSHH-CCC-039	11/17/2003	830	Concrete	Basement	Composite of samples 293 & 294.	0.58	ppm
FSHH-CCC-040	11/17/2003	835	Concrete	Basement	Composite of samples 349, 350, 351, & 352.	0.56	ppm
FSHH-CCC-041	11/17/2003	840	Concrete	Basement	Composite of samples 353, 354, 355, & 356.	0.52	ppm
FSHH-CCC-042	11/17/2003	845	Concrete	Basement	Composite of samples 297, 298, 299, 300, & 301.	2.3	ppm
FSHH-CCC-043	11/17/2003	850	Concrete	Basement	Composite of samples 302, 303, 304, 305, & 361.	0.85	ppm
FSHH-CCC-044	11/17/2003	855	Concrete	Basement	Composite of samples 344, 345, 346, 347, & 348.	1.45	ppm
FSHH-CCC-045	11/17/2003	900	Concrete	Basement	Composite of samples 339, 340, 341, 342, & 343.	1.05	ppm
FSHH-CCC-046	11/17/2003	905	Concrete	Basement	Composite of samples 306, 307, 308, 309, & 310.	7	ppm
FSHH-CCC-047	11/17/2003	910	Concrete	Basement	Composite of samples 311, 312, 313, 314, & 315.	10.5	ppm
FSHH-CCC-048	11/17/2003	915	Concrete	Basement	Composite of samples 316, 317, 318, 319, & 320.	0.55	ppm
FSHH-CCC-049	11/17/2003	920	Concrete	Basement	Composite of samples 321, 322, 323, 324, & 325.	2.2	ppm
FSHH-CCC-050	11/17/2003	925	Concrete	Basement	Composite of samples 326, 327, 328, 329, & 330.	1.2	ppm
FSHH-CCC-051	11/17/2003	930	Concrete	Basement	Composite of samples 333, 334, 335, & 365.	0.212	ppm
FSHH-CCC-052	11/17/2003	935	Concrete	Basement	Composite of samples 336, 337, & 338.	1.2	ppm
FSHH-CCC-053	11/17/2003	940	Concrete	Basement	Composite of samples 357, 358, 359, & 360.	0.48	ppm
FSHH-CCC-054	11/17/2003	945	Concrete	Basement	Composite of samples 362, 469, & 470.	810	ppm
FSHH-CCC-055	11/17/2003	950	Concrete	Basement	Composite of samples 363, 364, 366, 367, & 368.	1.1	ppm
FSHH-CCC-056	11/17/2003	955	Concrete	Basement	Composite of samples 331 & 332.	0.6	ppm
FSHH-CCC-057	11/17/2003	1000	Concrete	Basement	Composite of samples 369, 370, 371, 372, & 373.	2.85	ppm
FSHH-CCC-058	11/17/2003	1005	Concrete	Basement	Composite of samples 374, 375, 376, 377, & 378.	6.5	ppm
FSHH-CCC-059	11/17/2003	1010	Concrete	Basement	Composite of samples 379, 380, 381, 382, & 383.	0.6	ppm
FSHH-CCC-060	11/17/2003	1015	Concrete	Basement	Composite of samples 386, 387, 388, 389, & 390.	0.95	ppm
FSHH-CCC-061	11/17/2003	1020	Concrete	Basement	Composite of samples 384, 385, 391, 392, & 393.	1.7	ppm
FSHH-CCC-062	11/17/2003	1025	Concrete	Basement	Composite of samples 394, 395, 396, 397, & 398.	1.25	ppm
FSHH-CCC-063	11/17/2003	1030	Concrete	Basement	Composite of samples 399, 400, 401, 402, & 403.	0.85	ppm
FSHH-CCC-064	11/17/2003	1035	Concrete	Basement	Composite of samples 404, 410, 411, 412, & 414.	0.255	ppm
FSHH-CCC-065	11/17/2003	1040	Concrete	Basement	Composite of samples 405, 406, 407, 408, & 409.	2.2	ppm
FSHH-CCC-066	11/17/2003	1045	Concrete	Basement	Composite of samples 413, 415, 416, 417, & 418.	0.75	ppm

Table B-3
Summary of Analytical Results-Solid Samples
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

SAMPLE ID	SAMPLE DATE	SAMPLE TIME	MATRIX	LOCATION	DESCRIPTION	PCB RESULT	UNIT
FSHH-CCC-067	11/17/2003	1050	Concrete	Basement	Composite of samples 419, 420, 421, 422, & 423.	2.15	ppm
FSHH-CCC-068	11/17/2003	1055	Concrete	Basement	Composite of samples 424, 425, 426, 427, & 428.	0.22	ppm
FSHH-CCC-069	11/17/2003	1100	Concrete	Basement	Composite of samples 429, 430, 431, & 432	0.152	ppm
FSHH-CCC-070	11/17/2003	1105	Concrete	Basement	Composite of samples 433, 434, 435, & 436.	0.14	ppm
FSHH-CCC-071	11/17/2003	1110	Concrete	Basement	Composite of samples 437, 438, 439, 440, & 441.	2.1	ppm
FSHH-CCC-072	11/17/2003	1115	Concrete	Basement	Composite of samples 442, 443, 444, & 445.	0.44	ppm
FSHH-CCC-073	11/17/2003	1120	Concrete	Basement	Composite of samples 446, 447, 448, 449, & 450.	2.95	ppm
FSHH-CCC-074	11/17/2003	1125	Concrete	Basement	Composite of samples 451, 452, 453, 454, & 455.	0.24	ppm
FSHH-CCC-075	11/17/2003	1130	Concrete	Basement	Composite of samples 456, 457, 458, 459, & 460.	0.8	ppm
FSHH-CCC-076	11/17/2003	1135	Concrete	Basement	Composite of samples 461, 462, 463, 464, & 465.	0.9	ppm
FSHH-CCC-077	11/17/2003	1140	Concrete	Basement	Composite of samples 466, 467, & 468.	0.174	ppm
REDO-A-164	12/8/2003	1510	Solid	Basement	Resample of sample 164	0.043	ppm
REDO-A-163	12/8/2003	1540	Solid	Basement	Resample of sample 163	0.054	ppm
REDO-A-165	12/8/2003	1620	Solid	Basement	Resample of sample 165	0.16	ppm
REDO-A-166	12/8/2003	1645	Solid	Basement	Resample of sample 166	45	ppm
REDO-A-162	12/8/2003	1715	Solid	Basement	Resample of sample 162	0.02	ppm
FSHH-CC-307	12/9/2003	400	Solid	Basement	Sample location missed during sampling	0.091	ppm
132/4GRAB	12/9/2003	900	Solid	Basement	Soil in Main transformer area	260	ppm
REDO-362	12/9/2003	1630	Solid	Basement	Resample of sample 362	<0.033	ppm
REDO-469	12/9/2003	1645	Solid	Basement	Resample of sample 469	0.03	ppm
REDO-470	12/9/2003	1655	Solid	Basement	Resample of sample 470	0.03	ppm
REDO-132	12/10/2003	1030	Solid	Basement	Resample of sample 132	0.8	ppm
REDO-133	12/10/2003	1040	Solid	Basement	Resample of sample 133	3.2	ppm
REDO-134	12/10/2003	1050	Solid	Basement	Resample of sample 134	230	ppm

NOTE:

ppm= Parts per million

Shaded result indicates exceedance of 50 ppm cleanup goal

* Results are total Asbestos content

Attachment C

Table C-1 Waste Disposal Table

Table C-1
Waste Disposal Table
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

Date	Waste	Quantity	Units	Manifest Numbers	Treatment/Facility
9/25/2002	PCB contaminated water	5,115	gallons	MI8699683	Treatment / US Liquids
10/10/2002	PCB contaminated water	1,651	gallons	MI8699747	Treatment / US Liquids
10/10/2002	PCB contaminated water	2,005	gallons	MI8699748	Treatment / US Liquids
9/17/2003	Transformer carcasses	20,500	kilograms	MI8742686	Landfill/ Environmental Recycling
9/19/2003	PCB contaminated solids	15,150	kilograms	MI9298590	Landfill / Wayne Disposal
9/22/2003	PCB contaminated water	7,000	gallons	MI8600608	Treatment / US Liquids
9/22/2003	PCB contaminated water	10,000	gallons	MI8699352	Treatment / US Liquids
9/22/2003	PCB contaminated water	7,000	gallons	MI8699604	Treatment / US Liquids
9/22/2003	PCB contaminated water	7,000	gallons	MI8699605	Treatment / US Liquids
9/22/2003	PCB contaminated water	7,000	gallons	MI8699606	Treatment / US Liquids
9/22/2003	PCB contaminated water	7,000	gallons	MI8699607	Treatment / US Liquids
9/22/2003	PCB contaminated water	7,000	gallons	MI8699609	Treatment / US Liquids
9/22/2003	PCB contaminated water	7,000	gallons	MI8699610	Treatment / US Liquids
9/22/2003	PCB contaminated water	7,000	gallons	MI8699611	Treatment / US Liquids
9/22/2003	PCB contaminated water	10,000	gallons	MI8699612	Treatment / US Liquids
9/22/2003	PCB contaminated water	10,000	gallons	MI8699613	Treatment / US Liquids
9/22/2003	PCB contaminated water	10,000	gallons	MI8699614	Treatment / US Liquids
9/22/2003	PCB contaminated water	10,000	gallons	MI8699615	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699655	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699656	Treatment / US Liquids
9/23/2003	PCB contaminated water	10,000	gallons	MI8699657	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699658	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699659	Treatment / US Liquids
9/23/2003	PCB contaminated water	10,000	gallons	MI8699660	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699661	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699662	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699663	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699664	Treatment / US Liquids
9/23/2003	PCB contaminated water	10,000	gallons	MI8699665	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699666	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699667	Treatment / US Liquids
9/23/2003	PCB contaminated water	10,000	gallons	MI8699668	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699669	Treatment / US Liquids
9/23/2003	PCB contaminated water	7,000	gallons	MI8699670	Treatment / US Liquids
9/23/2003	PCB contaminated solids	5,089	kilograms	MI9298598	Landfill / Wayne Disposal
9/24/2003	PCB contaminated water	10,000	gallons	MI8600672	Treatment / US Liquids
9/24/2003	PCB contaminated water	7,000	gallons	MI8699671	Treatment / US Liquids
9/24/2003	PCB contaminated water	10,000	gallons	MI8699673	Treatment / US Liquids
9/24/2003	PCB contaminated water	10,000	gallons	MI8699674	Treatment / US Liquids
9/24/2003	PCB contaminated water	7,000	gallons	MI8699675	Treatment / US Liquids
9/24/2003	PCB contaminated water	7,000	gallons	MI8699678	Treatment / US Liquids
9/24/2003	PCB contaminated water	10,000	gallons	MI8699679	Treatment / US Liquids
9/24/2003	PCB contaminated water	7,000	gallons	MI8699680	Treatment / US Liquids
9/24/2003	PCB contaminated water	10,000	gallons	MI8699681	Treatment / US Liquids

Table C-1
Waste Disposal Table
Former Statler Hilton Hotel
1539 Washington Blvd.
S05-0308-003
Detroit, Wayne, Michigan

Date	Waste	Quantity	Units	Manifest Numbers	Treatment/Facility
9/25/2003	PCB contaminated water	8,115	gallons	MI8699682	Treatment / US Liquids
9/29/2003	PCB contaminated water	7,000	gallons	MI8699684	Treatment / US Liquids
9/29/2003	PCB contaminated water	7,000	gallons	MI8699685	Treatment / US Liquids
9/30/2003	PCB contaminated water	7,000	gallons	MI8699686	Treatment / US Liquids
9/30/2003	PCB contaminated water	7,000	gallons	MI8699687	Treatment / US Liquids
9/30/2003	PCB contaminated solids	12,256	kilograms	MI9298627	Landfill / Wayne Disposal
10/1/2003	PCB contaminated water	7,000	gallons	MI8699688	Treatment / US Liquids
10/1/2003	PCB contaminated water	1,367	gallons	MI8699689	Treatment / US Liquids
10/6/2003	PCB contaminated water	5,765	gallons	MI8699690	Treatment / US Liquids
10/6/2003	PCB contaminated water	6,532	gallons	MI8699691	Treatment / US Liquids
10/7/2003	PCB contaminated water	5,637	gallons	MI8699692	Treatment / US Liquids
10/10/2003	PCB contaminated solids	12,601	kilograms	MI9298696	Landfill / Wayne Disposal
10/15/2003	PCB contaminated water	6,125	gallons	MI8699693	Treatment / US Liquids
10/15/2003	PCB contaminated water	5,100	gallons	MI8699694	Treatment / US Liquids
10/16/2003	PCB contaminated water	2,500	gallons	MI8699696	Treatment / US Liquids
10/16/2003	PCB contaminated solids	8,242	kilograms	MI9298722	Landfill / Wayne Disposal
10/17/2003	PCB contaminated water	500	gallons	MI8699695	Treatment / US Liquids
10/17/2003	PCB contaminated solids	13,880	kilograms	MI9298727	Landfill / Wayne Disposal
10/20/2003	PCB contaminated solids	13,064	kilograms	MI9298736	Landfill / Wayne Disposal
10/20/2003	PCB contaminated solids	7,963	kilograms	MI9298737	Landfill / Wayne Disposal
10/24/2003	PCB contaminated solids	20,000	kilograms	MI9298738	Landfill / Wayne Disposal
11/6/2003	PCB contaminated solids	12,500	kilograms	MI9298806	Landfill / Wayne Disposal
11/8/2003	PCB contaminated solids	12,500	kilograms	MI9298821	Landfill / Wayne Disposal
11/11/2003	PCB contaminated water	2,500	gallons	MI8699697	Treatment / US Liquids
11/11/2003	PCB contaminated water	2,500	gallons	MI8699698	Treatment / US Liquids
11/11/2003	PCB contaminated water	2,500	gallons	MI8699699	Treatment / US Liquids
11/12/2003	PCB contaminated water	2,500	gallons	MI8699841	Treatment / US Liquids
11/13/2003	PCB contaminated water	750	gallons	MI8699842	Treatment / US Liquids
11/13/2003	PCB contaminated water	250	gallons	MI8699843	Treatment / US Liquids
11/17/2003	PCB contaminated solids	12,500	kilograms	MI9298880	Landfill / Wayne Disposal
12/8/2003	PCB contaminated solids	3,500	kilograms	MI8976492	Landfill / Wayne Disposal
12/12/2003	PCB contaminted liqud	23	55-gallon drums	MI8790075	Treatment/Spring Grove Resource Recovery
12/12/2003	PCB contaminated solids	6,000	kilograms	MI9444501	Landfill / Wayne Disposal

Attachment D

Select Photo Documentation

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/22/03

PHOTO NO: FSHH-103 **DIRECTION:** N **SUBJECT:** 10,000 gallon tanker truck leaving site to US Liquids for disposal

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/22/03

PHOTO NO: FSHH-105 **DIRECTION:** E **SUBJECT:** ERRS personnel scraping beams in basement area

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/22/03

PHOTO NO: FSHH-106 **DIRECTION:** W **SUBJECT:** Drums of oil and water from transformer area ready for disposal

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/22/03

PHOTO NO: FSHH-107 **DIRECTION:** N **SUBJECT:** Pump removing water from sub-basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/23/03

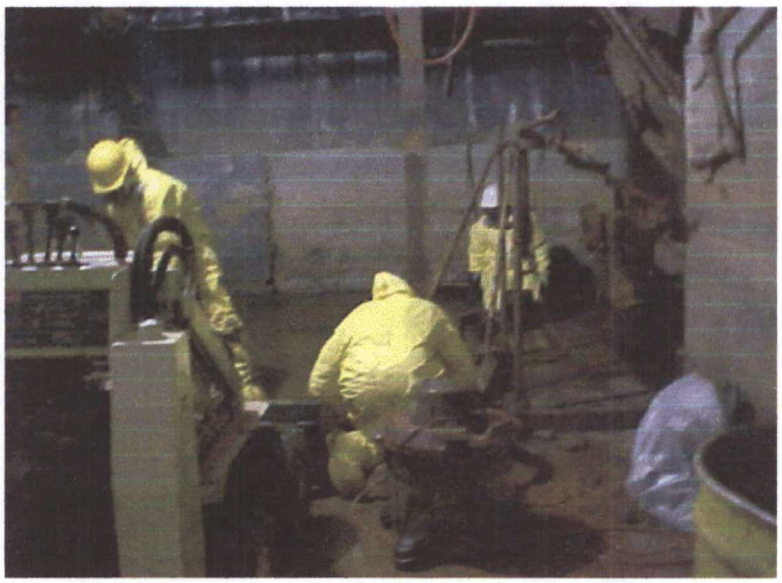
PHOTO NO: FSHH-111 **DIRECTION:** N **SUBJECT:** Truck leaving site with full roll-off

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/23/03

PHOTO NO: FSHH-114 **DIRECTION:** SE **SUBJECT:** Capacitor closet where capacitors once were located.

PHOTOGRAPHER: L. Ash



SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/23/03

PHOTO NO: FSHH-116 **DIRECTION:** E **SUBJECT:** ERRS personnel scraping and removing loose debris

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/23/03

PHOTO NO: FSHH-117 **DIRECTION:** W **SUBJECT:** Suspect PCB-contaminated ACM found on the floor in the basement area

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/23/03

PHOTO NO: FSHH-118 **DIRECTION:** E **SUBJECT:** Debris pile ready for removal into roll-off

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/24/03

PHOTO NO: FSHH-130 **DIRECTION:** E **SUBJECT:** Pump after removing estimated 250,000 gallons from sub-basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/26/03

PHOTO NO: FSHH-139 **DIRECTION:** E **SUBJECT:** Crew removing debris from basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/29/03

PHOTO NO: FSHH-141 **DIRECTION:** E **SUBJECT:** Power washing walls and ceilings in sub-basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/30/03

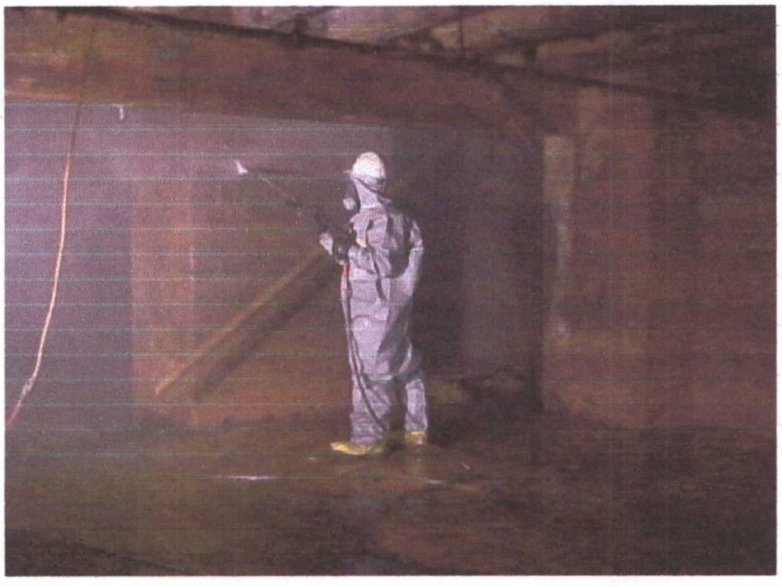
PHOTO NO: FSHH-145 **DIRECTION:** SE **SUBJECT:** Empty roll-off delivered to site

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/30/03

PHOTO NO: FSHH-151 **DIRECTION:** E **SUBJECT:** 4" and 6" pumps, 4" pump removing water from sub-basement

PHOTOGRAPHER: L. Ash



SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 9/30/03

PHOTO NO: FSHH-153 **DIRECTION:** E **SUBJECT:** Power washing of walls and ceiling in sub-basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/2/03

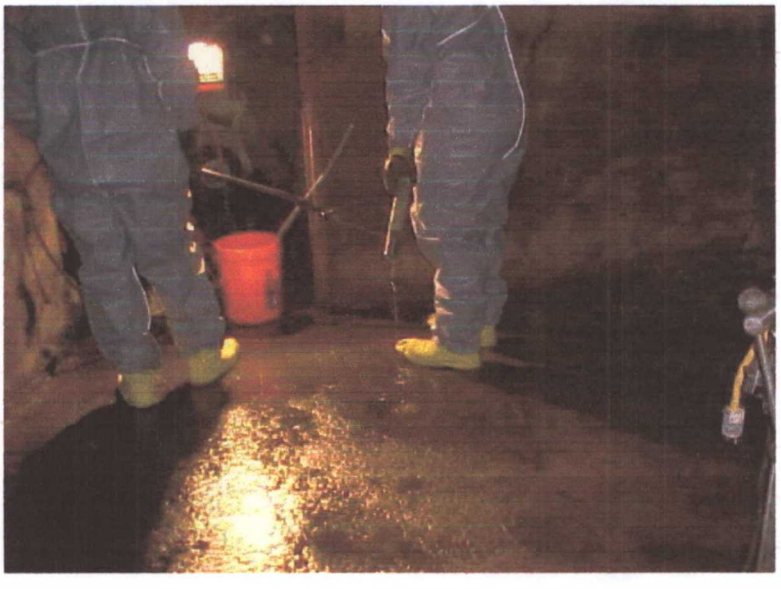
PHOTO NO: FSHH-157 **DIRECTION:** E **SUBJECT:** Mini excavator dropped down to basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/2/03

PHOTO NO: FSHH-158 **DIRECTION:** SW **SUBJECT:** Concrete corer in sub-basement

PHOTOGRAPHER: L. Ash



SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/2/03

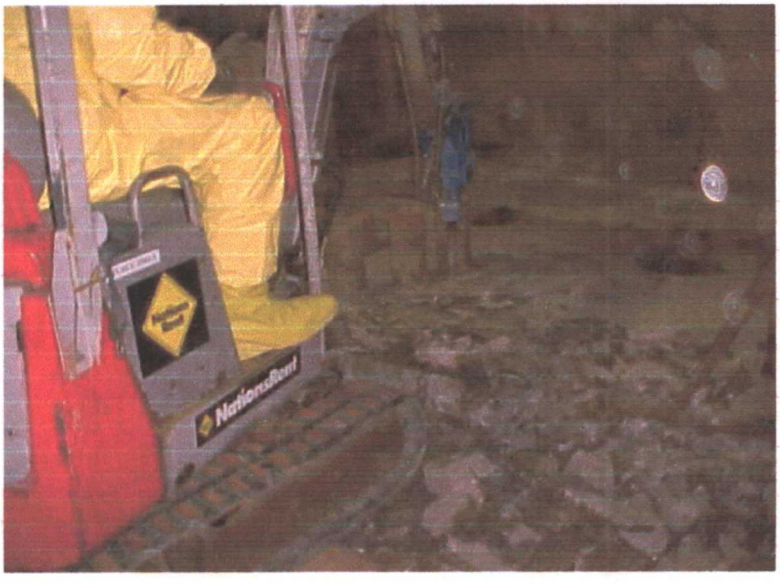
PHOTO NO: FSHH-159 **DIRECTION:** NE **SUBJECT:** Crew deconing drill bit

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/2/03

PHOTO NO: FSHH-160 **DIRECTION:** SW **SUBJECT:** Core in backroom of basement

PHOTOGRAPHER: L. Ash



SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/2/03

PHOTO NO: FSHH-164 **DIRECTION:** E **SUBJECT:** Mini excavator with jack hammer breaking concrete in main transformer area

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/3/03

PHOTO NO: FSHH-168 **DIRECTION:** NE **SUBJECT:** Mini-loader from sub-basement moved up to basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/7/03

PHOTO NO: FSHH-173 **DIRECTION:** E **SUBJECT:** Jack hammer breaking concrete in basement main transformer area

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/7/03

PHOTO NO: FSHH-177 **DIRECTION:** SE **SUBJECT:** Power washing walls and ceilings in sub-basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/7/03

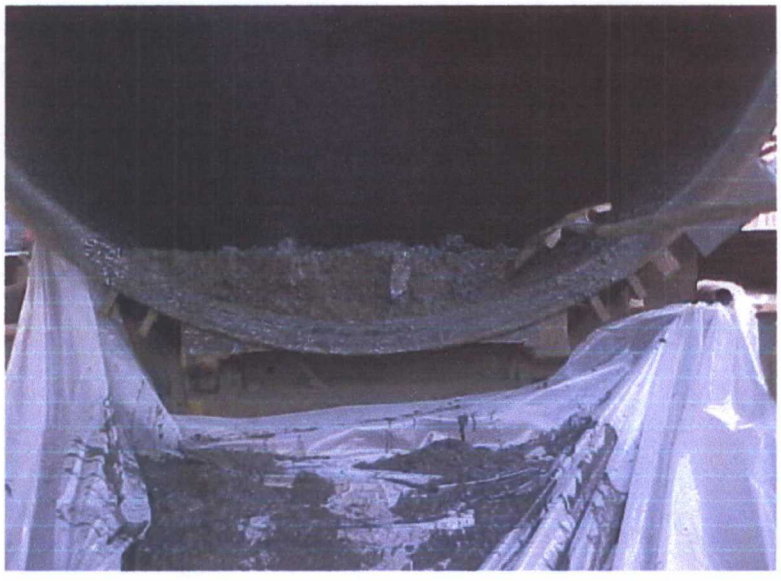
PHOTO NO: FSHH-179 **DIRECTION:** S **SUBJECT:** 55 gallon drum of excess waste in Vac-Truck

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/7/03

PHOTO NO: FSHH-181 **DIRECTION:** S **SUBJECT:** Waste from Vac-Truck being drummed

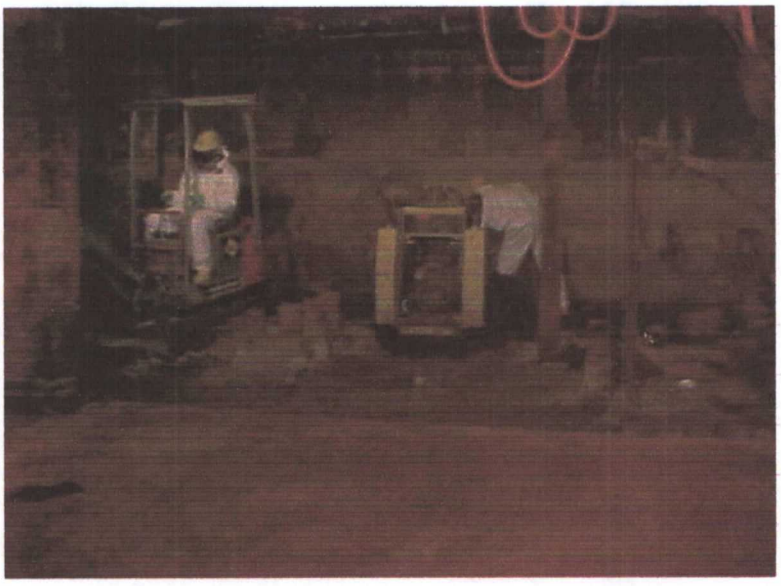
PHOTOGRAPHER: L. Ash



SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/7/03

PHOTO NO: FSHH-183 **DIRECTION:** S **SUBJECT:** Layer of debris and excess waste in Vac-Truck that was drummed

PHOTOGRAPHER: L. Ash



SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/8/03

PHOTO NO: FSHH-185 **DIRECTION:** E **SUBJECT:** ERRS personnel busting and removing concrete from main transformer area

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/8/03

PHOTO NO: FSHH-186 **DIRECTION:** SE **SUBJECT:** Capacitor being removed from basement and placed into roll-off

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/9/03

PHOTO NO: FSHH-190 **DIRECTION:** SW **SUBJECT:** Busted up concrete and tile in main transformer area

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/14/03

PHOTO NO: FSHH-209 **DIRECTION:** N **SUBJECT:** ERRS personnel removing capacitor closet

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/17/03

PHOTO NO: FSHH-221 **DIRECTION:** E **SUBJECT:** Main transformer area ready for power washing

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/17/03

PHOTO NO: FSHH-222 **DIRECTION:** SW **SUBJECT:** ERRS personnel removing debris and dust from basement floor

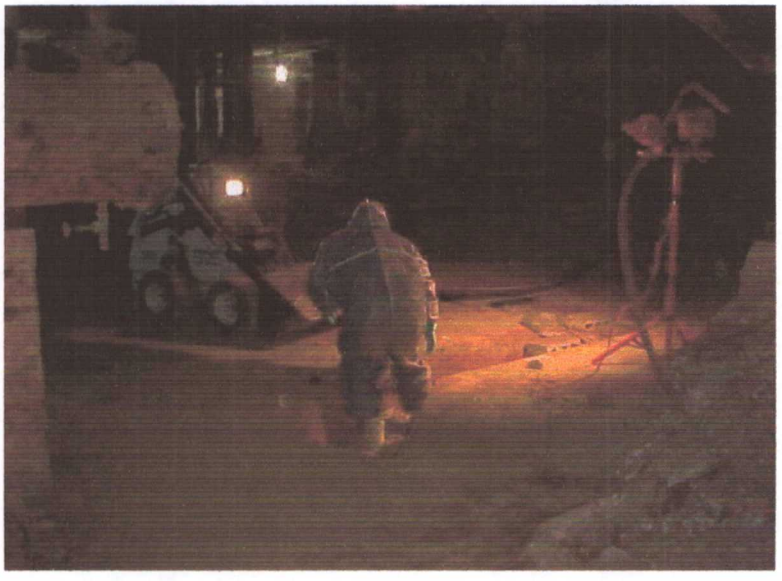
PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/22/03

PHOTO NO: FSHH-226 **DIRECTION:** SE

PHOTOGRAPHER: L. Ash

SUBJECT: East side of elevator shaft, ERRS personnel scraping top layer off for disposal and resample

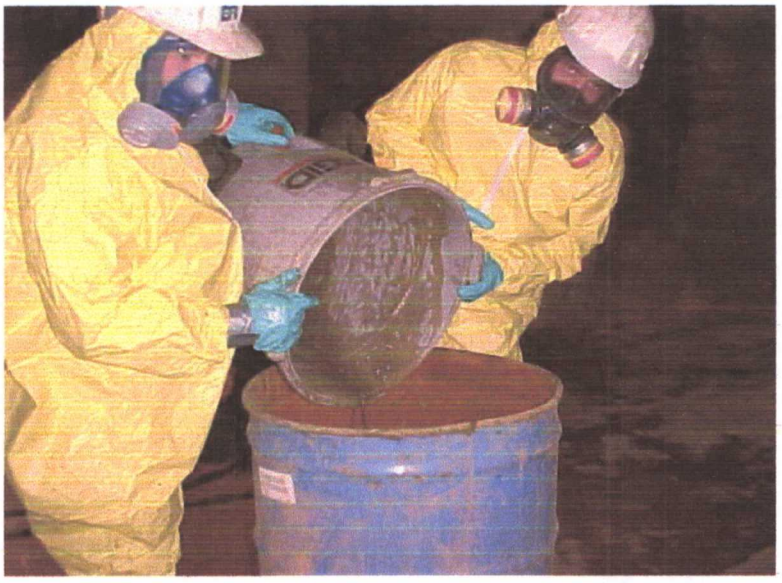


SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/24/03

PHOTO NO: FSHH-231 **DIRECTION:** NW

PHOTOGRAPHER: R.Nemirovsky

SUBJECT: Crew removing debris from trenches in basement laundry room.



SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 10/30/03

PHOTO NO: FSHH-242 **DIRECTION:** SW **SUBJECT:** Crew drumming wash water from machinery room pressure washing.

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 11/5/03

PHOTO NO: FSHH-253 **DIRECTION:** E **SUBJECT:** Pressure washing laundry room in basement

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 11/17/03

PHOTO NO: FSHH-280 **DIRECTION:** SE **SUBJECT:** Shop vac being disposed of into on-site roll-off

PHOTOGRAPHER: L. Ash

SITE: Former Statler Hilton Hotel - Removal Action **DATE:** 11/10/03

PHOTO NO: FSHH-267 **DIRECTION:** SE **SUBJECT:** Drums of oil and water from transformer area ready for disposal

PHOTOGRAPHER: L. Ash